REMARKS/ARGUMENTS

This amendment is submitted in response to the Office Action dated April 21, 2004. Claims 1-37 are pending. The specification and claims 17 and 22 have been amended to correct typographical errors as suggested by the Examiner.

The Examiner rejected claims 1-37 under 35 USC §102 (b) as being anticipated by Lemole et al. (US 6,009,410). Applicant respectfully disagrees.

The present invention provides a meta-application architecture for allowing photo-service websites to receive and send images to and from a wide range of client device types, and for integrating the services of the photo-service sites for access by users of the client devices. The present invention also allows web applications running in a web browser on the client devices to access all of the user's image files regardless of whether the image files are stored on the client device or on sites on the Internet, thereby enhancing imaging services provided to the client devices.

Referring to FIG. 1, the system 10 includes multiple client devices 12 that request imaging services from multiple online photo-service sites 14. The photo-service sites 14 are sites on the Internet that provide different types of digital imaging services. For example, one photo-service site 14 may provide an image hosting service, while another photo-service site 14 provides image printing services, for instance. One aspect of the present invention provides a meta-application 22 architecture that provides a common communication framework for integrating photo-service sites 14 and services for client devices 12. The meta-application architecture includes a site on the Internet, referred to as the image gateway 18 that interfaces between the client devices 12 and the photo-service sites 14. In a preferred embodiment, the image gateway 18 includes a gateway server 20, a software meta-application 22, and a set of site adapter software 24 that provide a set of standard APIs and data formats that the photo-service

sites 14 use so that the image gateway 18 can present data and services from the sites 14 to the various client devices 12. These same APIs and data formats allow the image gateway 18 to present the services of multiple photo-services 14 in one integrated application, and allow communication among the photo-services sites 14. For example, the image gateway 18 enables a user with images stored on one photo-host site to access to the services of all print service providers who also use the image gateway 18. The photo-hosting site 14 would not need to make any special effort in order to work with the print service providers since they are all bound together by the meta-application.

One reason that there is no standard for communication between photo-service sites 14 is because each photo-service site 14 represents its own data and services in different formats. For example, all photo-hosting web sites 14 organize a user's images in a nested tree-like structure similar to a file directory, but the names of the nodes in these trees vary across sites. For instance, some of the terms used include "album," "pholio," "page," and "shelves".

According to the present invention, the meta-application 22 abstracts the underlying data model and the function provided by the photo-service sites 14, which is common across the photo-service sites 14, to define a common data model format for the data, referred to here as a meta photo-service model.

The meta-application architecture of the present invention also provides web applications 42 access to the user's images, which may be stored both locally on the client device 12 and distributed across photo-service sites 14.

When the web browser in the client device 12 begins interacting with the web application 42, the web application 42 sends a request to the gateway server 20 asking what images are available for the user in step 108. In a preferred embodiment, the web application 42 identifies the user to the gateway server 20 using the user account or user ID, which was provided to the

web application 42 when the connection was made to the application 42 by the gateway server 20. In response, the gateway server 20 prepares and returns a list of image references and other information corresponding to the user's images in step 110.

Referring again to FIG. 2A, for images that are identified in the list 50 as being stored locally on the client device 12 in step 114, the web application 42 generates a reference that comprises a file path or other pointer to the image in the client device 12 along with a resize command in step 116. Preferably, this translation from image ID to the file path is performed by the gateway server 20 when the web page containing the ID passes through on its way from the web application 42 to the client device 12.

For images that are identified in the list 50 as being stored on a photo-service site 14 or other server in step 118, the web application 42 makes a request for the image from the gateway server 20 using the image ID in step 120. The gateway server 20 then fetches the image from the indicated location, resizes and converts the image to the required format, and passes a URL to the resulting resized image file back to the web application 42 in step 122. The web application 42 then inserts this URL into to the web page that is transmitted to the device browser 54 in step 124. Alternatively, the translation from image ID to a URL to a resized, converted image file is performed at the gateway server 20 when the web page containing the ID passes through on its way from the web application 42 to the client 12.

In contrast to the present invention, LeMole teaches a method and system for presenting customized advertising to a user. LeMole teaches that a user at a client terminal is connected to an Internet access service provider (IASP), and thence to the Internet (Col. 1 lines 16-18). LeMole provides a customize advertising repository (CAR) that is accessible by the user's client terminal through the terminal browser. When the user accesses his or her customized ad repository through the browser, a composite advertising page is dynamically configured by the

CAR server for that particular user based on that user's previously provided user profile, or the page can be dynamically configured on a context dependent basis determined from the particular web site or sites that the user has accessed prior to entering the commercial context mode. The composite page is configured from a database which stores images, banners, animation, etc., from a plurality of advertisers (Col. 2 lines 12-36).

Referring now to the claims, is respectfully submitted that LeMole fails to teach or suggest each and every on element of the independent claims. For example, LeMole fails to teach or suggest "a method for integrating web photo-services for a browser-enabled device," as recited in the preamble of claim 1. In the rejection, the Examiner contends that LeMole's disclosure of an IASP to the analogous to "photo-service site". However, in the present invention, photo-service sites are defined as "sites on the Internet that provide different types of digital imaging services. For example, one photo-service site 14 may provide an image hosting service, while another photo-service site 14 provides image printing services, for instance" (Page 8, line 14). In contrast, an IASP is described in LeMole as providing the user's client terminal with Internet access. LeMole states "illustratively, IASP 102 can be an access provider such as AT&T WorldNet (SM) on-line service" (Col. 3, lines15-27). It is respectfully submitted that a service such as AT&T WorldNet does not meet the definition of a photo-service site that enables a user to upload photos for storage and online sharing.

LeMole further fails to teach or suggest "receiving from the device an inventory of images stored on the device," as recited in step (c) of claim 1. Although the user terminal in LeMole maybe capable of storing images, applicant could find no teaching or suggestion that any "inventory of images" from the device is sent to the CAR server. Instead, the images displayed on the composite page in LeMole are retrieved from a database that stores the images from the advertisers.

LeMole further fails to teach or suggest "providing an image-related Web application to the device over the network, the Web application requiring *access to the user's images*," as recited in step (d) of claim 1. Similarly, LeMole also fails to teach or suggest "providing a list of the *images associated with a user's account* to the web application," as recited in step (e) of claim 1. Even if the CAR server is considered a Web application, it requires images from the advertisers that meet the stated interest and demographics of the user, rather than images from the user of the terminal (or device).

LeMole further fails to teach or suggest "wherein the list of images includes an image reference for each image and an indication of whether each image is stored on the device or on the photo-service site," as recited in step (e) of claim 1. LeMole teaches providing hyperlinks to the advertising sites of each of the combined advertisers, but LeMole fails to teach or suggest that the page includes links to the advertiser's images, rather than links to the web sites of the advertiser. And nowhere in LeMole is it taught that the page indicates whether an image is stored in the device or on the photo-service site. This is because LeMole is not related to servicing images of the user and therefore is silent to the user's terminal storing images. Images in LeMole only belong to the advertisers and are only stored in one place, the CAR server.

The above arguments apply with full force and effect to independent claims 12, 22, and 28.

In view of the foregoing, it is submitted that claims 1-37 are allowable over the cited references. Because the secondary references stand or fall with the primary references, claims are allowable because they are dependent upon the allowable independent claims. Accordingly, Applicant respectfully requests reconsideration and passage to issue of claims 1-37 as now presented.

Applicant's attorney believes that this application is in condition for allowance. Should any unresolved issues remain, Examiner is invited to call Applicant's attorney at the telephone number indicated below.

Respectfully submitted,

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Date

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